

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
GREENVILLE DIVISION**

**In re:**

**CAH ACQUISITION COMPANY #1, LLC  
d/b/a WASHINGTON COUNTY HOSPITAL,**

**Debtor.**

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**THOMAS W. WALDREP, JR., AS  
LIQUIDATING TRUSTEE,**

**Plaintiff,**

**v.**

**REBOOT, INC. d/b/a HIPAA GUARD;  
RURAL LAB OUTREACH, LLC; and  
MICHAEL REECE,**

**Defendants.**

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**In re:**

**CAH ACQUISITION COMPANY #2, LLC  
d/b/a OSWEGO COMMUNITY HOSPITAL,**

**Debtor.**

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**THOMAS W. WALDREP, JR., AS  
LIQUIDATING TRUSTEE,**

**Plaintiff,**

**v.**

**REBOOT, INC. d/b/a HIPAA GUARD;  
RURAL LAB OUTREACH, LLC; and  
MICHAEL REECE,**

**Defendants.**

)  
) **Case No. 19-00730-5-JNC**

)  
) **Chapter 11**  
)

)  
) **Adv. Proc. No. 22-00101-5-JNC**  
)

)  
) **Case No. 19-01230-5-JNC**

)  
) **Chapter 11**  
)

)  
) **Adv. Proc. No. 22-00102-5-JNC**  
)

<b>In re:</b>	)	
	)	<b>Case No. 19-01180-5-JNC</b>
<b>CAH ACQUISITION COMPANY #3, LLC</b>	)	
<b>d/b/a HORTON COMMUNITY HOSPITAL,</b>	)	<b>Chapter 11</b>
	)	
<b>Debtor.</b>	)	
	)	
<b>THOMAS W. WALDREP, JR., AS</b>	)	
<b>LIQUIDATING TRUSTEE,</b>	)	
	)	<b>Adv. Proc. No. 22-00103-5-JNC</b>
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>REBOOT, INC. d/b/a HIPAA GUARD;</b>	)	
<b>RURAL LAB OUTREACH, LLC; and</b>	)	
<b>MICHAEL REECE,</b>	)	
	)	
<b>Defendants.</b>	)	
	)	
<b>In re:</b>	)	
	)	<b>Case No. 19-01300-5-JNC</b>
<b>CAH ACQUISITION COMPANY 6, LLC</b>	)	
<b>d/b/a I-70 COMMUNITY HOSPITAL,</b>	)	<b>Chapter 7</b>
	)	
<b>Debtor.</b>	)	
	)	
<b>THOMAS W. WALDREP, JR., AS</b>	)	
<b>CHAPTER 7 TRUSTEE,</b>	)	
	)	<b>Adv. Proc. No. 22-00104-5-JNC</b>
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>REBOOT, INC. d/b/a HIPAA GUARD;</b>	)	
<b>RURAL LAB OUTREACH, LLC; and</b>	)	
<b>MICHAEL REECE,</b>	)	
	)	
<b>Defendants.</b>	)	
	)	

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<b>In re:</b>	)	
	)	<b>Case No. 19-01298-5-JNC</b>
<b>CAH ACQUISITION COMPANY 7, LLC</b>	)	
<b>d/b/a PRAGUE COMMUNITY HOSPITAL,</b>	)	<b>Chapter 11</b>
	)	
<b>Debtor.</b>	)	
<hr/>	)	
<b>THOMAS W. WALDREP, JR., AS</b>	)	
<b>LIQUIDATING TRUSTEE,</b>	)	
	)	<b>Adv. Proc. No. 22-00105-5-JNC</b>
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>REBOOT, INC. d/b/a HIPAA GUARD;</b>	)	
<b>RURAL LAB OUTREACH, LLC; and</b>	)	
<b>MICHAEL REECE,</b>	)	
	)	
<b>Defendants.</b>	)	
<hr/>	)	
<b>In re:</b>	)	
	)	<b>Case No. 19-01697-5-JNC</b>
<b>CAH ACQUISITION COMPANY 12, LLC</b>	)	
<b>d/b/a FAIRFAX COMMUNITY HOSPITAL,</b>	)	<b>Chapter 11</b>
	)	
<b>Debtor.</b>	)	
<hr/>	)	
<b>THOMAS W. WALDREP, JR., AS</b>	)	
<b>LIQUIDATING TRUSTEE,</b>	)	
	)	<b>Adv. Proc. No. 22-00106-5-JNC</b>
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>REBOOT, INC. d/b/a HIPAA GUARD;</b>	)	
<b>RURAL LAB OUTREACH, LLC; and</b>	)	
<b>MICHAEL REECE,</b>	)	
	)	
<b>Defendants.</b>	)	
<hr/>	)	



NOW, THEREFORE, Plaintiff respectfully requests that the Court strike the “affirmative defenses” component of Defendants’ Responsive Pleading.

Respectfully submitted, this the 17<sup>th</sup> day of August, 2022.

/s/ Micah E. Marcus

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-and-

/s/ Thomas W. Waldrep, Jr.

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*Attorneys for the Plaintiff*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the forgoing **MOTION TO STRIKE DEFENDANTS' AFFIRMATIVE DEFENSES** was filed electronically in accordance with the Local Rules and served on this date upon the parties listed below by electronic service through the CM/ECF system or by United States First Class Mail.

Via CM/ECF

Eric J. Langston

*Counsel for defendants Reboot, Inc. d/b/a HIPAA GUARD; Rural Lab Outreach, LLC; and Michael Reece*

Jill Walters

*Counsel for defendants Reboot, Inc. d/b/a HIPAA GUARD; Rural Lab Outreach, LLC; and Michael Reece*

This, the 17<sup>th</sup> day of August, 2022.

**WALDREP WALL BABCOCK  
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